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January 13, 2022

Via Electronic Filing

The Honorable Taryn A. Merkl, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Jones v. Questfleet LLC et al*
Case No.: 1:21-cv-04042-CBA-TAM

Dear Honorable Magistrate Judge Merkl:

This law firm represents Plaintiff Vernon Jones in the above-referenced action. This letter is submitted jointly with Defendants Questfleet LLC, Mike “Doe”, and Raymond Pichardo (collectively, the “Defendants”)

Pursuant to Your Honors Individual Motion Practice Rule 1, and the directives contained in the January 7, 2022 Minute Entry and Order of the Honorable District Judge Carol Bagley Amon, this letter respectfully serves as a joint request to schedule a virtual settlement conference before Your Honor at a date and time set by the Court.

The parties have conferred, and can make themselves available on the following proposed dates and times:

1. Tuesday, February 8, 2022 beginning at 10:00 a.m.;
2. Thursday, February 10, 2022 beginning at 10:00 a.m.;
3. Friday, February 11, 2022 beginning at 10:00 a.m.;
4. Monday, February 14, 2022 beginning at 10:00 a.m.;
5. Tuesday, February 15, 2022 beginning at 10:00 a.m.;

This letter further serves as a joint request to extend the Phase I discovery completion deadline from January 7, 2022 to, through and including February 18, 22, and to extend the Phase II discovery completion deadline from February 11, 2022 to, through and including, March 25, 2022. This is the first request of its nature.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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